

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

TYLER TECHNOLOGIES, INC.,

Plaintiff,

v.

**VIRTUAL IMPACT PRODUCTIONS,
INC.,**

Defendant.

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:06-cv-1693

**PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR ENLARGEMENT OF
TIME TO FILE RESPONSE TO PLAINTIFF'S COMPLAINT**

Plaintiff Tyler Technologies, Inc. files this Response to Defendant's Motion for Enlargement of Time to File Response to Plaintiff's Complaint ("Motion") and would show the Court the matters set forth below.

1. On September 7, 2006, counsel for Defendant Virtual Impact Productions sent Plaintiff a letter alleging, among other things, patent infringement as part of Plaintiff's "long trail of misdeeds." The letter threatened legal action and demanded a response within three days. A copy of the letter is attached to Plaintiff's Original Complaint as Exhibit A.

2. Plaintiff filed its complaint against Defendant on September 15, 2006 and promptly served Defendant on September 20, 2006. Defendant filed no answer or other responsive pleading prior to its October 10, 2006 deadline.

3. Counsel for Plaintiff and Defendant spoke on October 18, 2006. At that time, Defendant requested an extension of time until October 31, 2006.

4. Defendant filed its present Motion on October 19, 2006, before counsel for Plaintiff responded to the requested extension. Shortly after the Motion was filed, Plaintiff agreed to extend the deadline for Defendant to file an answer to October 31, 2006.

5. Plaintiff opposes Defendant's request to extend the deadline for Defendant to file and serve a responsive pleading through and until Monday, November 6, 2006. Given the content of the September 7th letter from Defendant's counsel, Plaintiff considers its previous agreement to allow Defendant to file an answer by October 31, 2006 to be reasonable.

Respectfully submitted,

HUGHES & LUCE, L.L.P.

/s/ Megan K. Dredla

John W. Patton
Texas Bar No. 00798422
Megan K. Dredla
Texas Bar No. 24050530
1717 Main Street, Suite 2800
Dallas, Texas 75201
(214) 939-5500 (Office)
(214) 939-6100 (Fax)
pattonj@hughesluce.com
megan.dredla@hughesluce.com

**ATTORNEYS FOR PLAINTIFF TYLER
TECHNOLOGIES, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via that Court's CM/ECF system per Local Rule CV-5(a)(3) on this 27th day of October, 2006. Any other counsel of record will be served by first class mail.

/s/ Megan K. Dredla

Megan K. Dredla